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VIA E-FILING

April 4, 2024

The Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Sanchez v. EZ Parking, et al., 23 cv 4052

Dear Judge Scanlon:

I represent Plaintiff in the above-referenced matter. I write in response to the Court's Order, on behalf of counsel to the parties (please note that Defendant EZ Parking has not appeared in this action, and is believed to be defunct) to apprise the Court as to the status of discovery. We apologize for the delay in submitting this report.

The parties have interposed and responded to discovery requests. I raised with Counsel to Defendants EK Premier Services and Yan Moshe certain deficiencies concerning their respective responses. Defendant Moshe has rectified the concerns presented to him. Defendant EK Premier was significantly delayed in responding, but did so yesterday. Unfortunately, open issues remain concerning those responses. In that regard, I intend to submit a letter to the Court on Monday to request a pre-motion conference.

Once the discovery request issues are resolved, we can proceed to conduct the necessary depositions. The parties believe that between three and five depositions will be necessary, and

that those can be conducted by mid-May. Accordingly, the parties jointly and respectfully request an extension of the discovery deadline until May 15. We thank the court for its attention to these issues.

Respectfully submitted,

/s/

Vincent E. Bauer